

REGION 6 EXECUTIVE SUMMARY

DATE: June 3, 2011

TOPIC: Gulfco Marine Maintenance - General Notice Letters

DEADLINE/DUE DATE: As soon as possible

ACTION REQUIRED: Division Director's Signature

BACKGROUND: The Gulfco Restoration Group, comprised of four PRPs conducting the RI/FS under a UAO, requested EPA consider issuing General Notice Letters to other PRPs known to have arranged for disposal of hazardous waste at the Site. To support this request, the PRP Group submitted a report summarizing EPA records.

CURRENT STATUS: The Site Team reviewed the PRP Group's report and compared it to information in the Removal Report and RI Report. Based on the review, the Site Team recommends issuing General Notice Letters to four PRPs. EPA records, comprised of barge cleaning invoices, indicate these four PRPs arranged for disposal of hazardous waste identified in sampling conducted during the removal action and RI. The letter encourages the recipients to contact the current PRP Group and provides information on completed actions and public evidentiary records to assist in communications.

The Site Team believes the current PRP Group will promptly contact these PRPs in an effort to bring them into the PRP Group. An offer to attend a negotiations meeting is not included because the PRP Group will soon be submitting the FS in accordance with the UAO. It is expected these four parties would be included in any future special notice for post-ROD activities and cost recovery.

TECHNICAL CONCERNS: None are known.

COMMUNITY CONCERNS: None are known.

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